

Date: December 19, 2000

DSL-BQA-00-083

To: Home Health Agencies

HHA 36

From: Jan Eakins, Chief
Provider Regulation & Quality Improvement Section

cc: Susan Schroeder, Director
Bureau of Quality Assurance

Outcome Assessment Information Set (OASIS) Update

The purpose of this memorandum is to provide you with information related to:

- Satellite training on OASIS reports.
- Updated Interpretive Guidelines for Home Health Agencies.
- OASIS data item M0825 (therapy need).
- Change in time frame for follow-up assessments.
- Review of OASIS applicability.
- Frequently asked questions.
- OASIS training video and workbook.
- Bureau of Quality Assurance resources

Satellite Training on OASIS Reports

On January 19, 2001, the federal Health Care Financing Administration (HCFA) Center for Medicaid and State Operations will broadcast a two hour satellite training on the Case Mix and Adverse Event Reports based on OASIS data.

The program will be broadcast 12:00 noon – 2:00 p.m. CST (1:00 – 3:00 p.m. EST). A draft program agenda is attached to this memorandum.

The intended audience for the broadcast is home health agencies (HHAs), home health provider associations, the State Survey Agency and the HCFA Regional Offices. The broadcast will consist of a demonstration on how the reports can be generated from the State OASIS System, how to read the reports, what actions HHAs can take on the reports, and how the reports will be used by HCFA Regional Office and State surveyors. The presenters for this broadcast will include staff from HCFA and the Center for Health Services Policy Research, University of Colorado. The broadcast will have prerecorded presentations followed by a live question and answer session via phone and fax.

The Wisconsin Homecare Organization (WHO) has arranged viewing sites for all home health providers and interested persons at various locations throughout the state. The following table lists each viewing location, maximum seating, telephone number, and contact person.

| Viewing Site City | Maximum Seating | Telephone # | Contact Person |
|-------------------|-----------------|-----------------------|--------------------------------------------------|
| Madison | 55 | 608-278-1115 | Judi Loos Wisconsin Homecare Organization |
| Jefferson | 20 | 920-674-7186 | Sue Johann Jefferson County Health Department |
| La Crosse | Not provided | 608-791-9790 | Kathryn Olson Franciscan Skemp Home Health |
| Eau Claire | 30 | 715-831-0100 Ext. 250 | Sue Timm Northwest WI Home Care |

| | | | |
|-----------|----|--------------|--------------------------------------|
| Ellsworth | 30 | 715-273-6756 | Caralynn Hodgson Pierce County HH |
|-----------|----|--------------|--------------------------------------|

Since seating is limited at the viewing sites, you must call the contact person for the site to reserve seating. The contact will provide you with the site address, directions and parking options.

Training materials for the satellite session will be available the first week of January on the HCFA OASIS website under "Training" at <http://www.hcfa.gov/medicaid/oasis/oasishmp.htm>. Providers should download these materials to bring to the training. Training materials **will not** be provided at the viewing sites.

The Case Mix and Adverse Event Reports will be available to HHAs through the State OASIS system at the end of January.

Updated Interpretive Guidelines for Home Health Agencies

HCFA has updated the Medicare State Operations Manual, Appendix B, Interpretive Guidelines for Home Health Agencies. The update provides instructions for surveying OASIS regulations and includes regulatory language and guidance on the conditions of participation that were recently amended for the implementation of the prospective payment system (PPS) for HHAs.

This new/revised material became effective October 1, 2000. The cover page of HCFA Transmittal 21, in which this revised material was published, is attached for your information.

Electronic copies of the *change pages* of the Interpretive Guidelines are available on the HCFA website at <http://www.hcfa.gov/pubforms/transmit/R21SOM.pdf>.

The Interpretive Guidelines for Home Health Agencies in effect prior to October 1, 2000, and Transmittal 21 with the change pages are also available electronically on the State OASIS System website under "Bulletins."

OASIS Data Item M0825 (Therapy Need)

When a HHA estimates the number of therapy visits to be under 10, but during the course of the 60-day episode, determines that the patient requires 10 or more visits, the HHA should take the following steps:

- Obtain physician orders/update plan of care to reflect the need for additional therapy.
- Provide necessary documentation in the clinical record.
- Conduct an Other Follow-up OASIS Assessment, reason for assessment (RFA) 05, to reflect the current status of the patient.
- Transmit the Other Follow-up Assessment, RFA 05, to the State OASIS System.

For questions related to payment, contact Medicare Provider Relations at United Government Services, 1-877-309-4290.

Change in Time Frame for Follow-up Assessments

The final federal rule for PPS changed the OASIS timing requirements for OASIS follow-up assessments from an interval requiring a follow-up assessment every two months to a 60-day assessment schedule.

Effective October 1, 2000, HHAs must perform a follow-up comprehensive assessment within the last 5 days of the each 60-day certification period, i.e., between and including days 56-60. This 60-day time frame for follow-up assessments applies to all patients subject to OASIS.

Consult “What’s New” on the HCFA OASIS website at <http://www.hcf.gov/medicaid/oasis/oasishmp.htm>. HCFA guidance on this issue can be found under “OASIS Considerations for Non-Medicare PPS Patients” and “OASIS Considerations for Medicare PPS Patients.”

Warning message related to revised timing interval

The revised assessment interval may cause warning messages related to timing on OASIS follow-up assessment records to appear on the Final Validation Report produced by the State OASIS System. The following information will help HHAs know how to respond to this warning message.

For patients on service prior to October 1, 2000: The revised assessment interval may cause warning message number 262 related to timing on OASIS follow-up assessment records to appear on the Final Validation Report when the assessment is submitted for patients with a start of care prior to October 1, 2000. In this situation, the HHA can ignore the warning message.

For patients admitted after October 1, 2000: Patients admitted to the HHA after October 1, 2000, who remain on service beyond a single 60-day episode, are expected to be re-assessed with OASIS follow-up data collected during the last 5 days of each 60-day certification period, based on the start of care date. In this case, a warning message indicating deviation from the required time frame for collection of OASIS follow-up data would be valid and a cause for the HHA to examine its OASIS follow-up data collection schedule.

For more information, refer to the attached memorandum from HCFA dated November 20, 2000.

Review of OASIS Applicability

OASIS Data Collection

The comprehensive assessment and OASIS data collection requirements apply to all patients receiving skilled care, including Medicare, Medicaid, managed care, and private pay patients with the following exceptions: patients under the age of 18, patients receiving maternity services, and patients receiving only chore or housekeeping services.

OASIS Encoding and Transmission

HHAs must also encode and transmit OASIS data on all Medicare/Medicaid patients receiving skilled care (with the above exceptions).

A patient is considered a Medicare/Medicaid patient if Medicare or Medicaid reimburses for any service, including non-skilled care.

For example: A patient who receives skilled nursing services reimbursed by private insurance and home health aide services reimbursed by Medicare or Medicaid is considered a Medicare/Medicaid patient. OASIS data must be collected, encoded and transmitted for this patient.

OASIS Not Required

OASIS requirements continue to be delayed for patients receiving only non-skilled (personal care or home health aide) services.

Frequently Asked Questions

BQA will post frequently asked questions with their appropriate answers on the State OASIS System website under Bulletins. The date is noted each time that the Bulletins area is updated. The Bulletins area is a quick method for conveying information to providers, so please check the website frequently.

OASIS Training Video and Workbook

HCFA has developed a training video with an accompanying workbook that demonstrates patient assessment strategies for HHA clinicians. The purpose of the video is to illustrate how clinicians acquire patient information as part of the comprehensive assessment process using a variety of assessment techniques.

When the video is available to the State, BQA will post directions for obtaining the instructional material and the cost on the State OASIS System website under Bulletins.

Bureau of Quality Assurance Resources

Please direct any questions related to OASIS data collection to the following resources:

Software and OASIS data transmission:

- Chris Benesh, OASIS Automation Coordinator, 608/266-1718 or benesce@dhfs.state.wi.us.
- Cindy Symons, OASIS Technical Analyst, 608/266-9675 or symonc@dhfs.state.wi.us.

Clinical issues regarding OASIS data collection:

- Andrea Henrich, OASIS Education Coordinator, 608/267-3807 or henriam@dhfs.state.wi.us.
- Barbara Woodford, Nurse Consultant, 608/264-9896 or woodfa@dhfs.state.wi.us.

Department of Health & Human Services
Health Care Financing Administration

Center for Medicaid and State Operations
7500 Security Boulevard
Baltimore, MD 21244-1850

DATE: November 20, 2000

FROM: Director
Survey and Certification Group

SUBJECT: Outcome and Assessment Information Set (OASIS) Timing
Requirements—INFORMATION

TO: Home Health Agency OASIS Submission Staff
State Agency OASIS Educational Coordinators
State Agency OASIS Automation Coordinators

The purpose of this memorandum is to provide guidance to Home Health Agencies (HHAs) and State survey agencies concerning OASIS timing requirements during the transition period into the home health Prospective Payment System (PPS).

The Final Rule for PPS published in the Federal Register (65 FR 41128) on July 3, 2000, revised the timing requirements for the scheduling of OASIS follow-up assessments. Specifically, on page 41221, the OASIS timing schedule was changed from an interval requiring a follow-up assessment every two months to a 60-day assessment schedule.

This revised assessment interval will cause warning messages related to timing on OASIS follow-up assessment records to appear on the validation report produced by the State when the assessment is submitted for patients with a start of care prior to October 1, 2000.

The warning message results from the fact that the software will calculate due dates for follow-up assessments according to the new 60-day follow-up schedule, regardless of whether the start of care date is before or after October 1, 2000. In this situation, the warnings can be ignored with no consequence to the HHA.

The specific warning message generated by the State system (message number 262) cautions that the follow-up assessment completion date (M0090) does not meet the Health Care Financing Administration (HCFA) 60-day timing guidelines. The system edit that determines whether to generate this warning message considers the 60-day follow-up assessment schedule only. It is unable to consider the two-month schedule in effect prior to October 1, 2000. For that reason, the message can be ignored.

Note that the situation is unique to patients already on service prior to October 1, 2000, who are involved in the transition from one regulatory time frame (every 2 calendar months) to another (every 60 days). Generally speaking, HCFA does not encourage HHAs to ignore warning messages; however, in this exceptional situation, the warning message is unavoidable. Patients admitted to the HHA after October 1, 2000, and who remain on service beyond a single 60-day episode, are expected to be re-assessed with OASIS follow-up data collected during the last 5 days of the current 60-day period, based on the start of care date. In this case, a warning message indicating deviation from the required time frame for collection of OASIS follow-up data would be valid and a cause for the HHA to examine its follow-up data collection schedule.

HCFA is providing this memorandum for those who require documentation in addition to information provided on HCFA's web pages. We recognize the concern that a warning message may cause in the circumstances described above. For more information, please consult the HCFA OASIS web page at <http://www.hcfa.gov/medicaid/oasis/oasishmp.htm> and particularly information related to the transition to PPS at <http://www.hcfa.gov/medicaid/oasis/oasispps.htm>.

If you have any questions about these instructions, please contact your State OASIS Educational Coordinator or State OASIS Automation Coordinator.

/s/

Steven A. Pelovitz